



April 13, 2011

Ms. Darlene McGary, Contracting Officer  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Dear Ms. McGary:

Subject: COI Review and Certification  
Humbolt Mill SI Site, Champion, MI  
START Contract No. EP-S5-10-10  
TDD: TO-05-11-02-0005

This letter is in response to the Technical Direction Number (TDD) TO-05-11-02-0005 issued to OTIE under the START III contract for conducting a Site Inspection at the Humbolt Mill Site located at 4547 County Road 601 in Champion, MI. Pursuant to clause H.6 - TDD Conflict of Interest Certification- OTIE is providing a review and certification of COI relative to this site and the listed owners.

The U.S. EPA identified Kennecott Eagle Minerals Company, O'Dovero Properties, and Callahan Mining Corporation as Potential Responsible Parties (PRPs) for the above addressed site. Based on our records review, OTIE has not worked at this site or at any other locations for the above mentioned PRPs. OTIE did not detect any coincidences associated with the site or listed owners and did not find any facts or circumstances that would present an actual or potential COI. Based on our review showing no past work for the owners identified by the U.S. EPA for this site, OTIE does not recognize a COI relative to this site TDD.

OTIE certifies to the best of our knowledge and belief that all actual and potential organizational COI has been reported to the Contracting Officer and that, to the best of our knowledge and belief, no actual or potential organizational COI exist. OTIE personnel who perform work under this Task Order have been informed of their ongoing obligation to report personal COI and organizational COI to their supervisors.

I trust that this letter adequately addresses the COI review for OTIE relative to our contract and this Task Order. If you have any questions on this information, please contact me.

Sincerely,

Raghu Nagam  
Program Manager

cc: Sam Chummar, U.S. EPA Project Officer

Cyndi Shaw/OTIE Contract Manager